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Martha Swann v. East Ala Med Center -- Defendant's Failure to Cooperate in Discovery. Plaintiff's Int 28 and RfP BB

Warren Lightfoot <wlightfoot@maynardnexsen.com>
To: Richard Newton <richardrussellnewton@gmail.com>
Cc: Brock Phillips <bphillips@maynardnexsen.com>

Fri, Feb 21, 2025 at 3:21 PM

Rick, at this time, we are not providing you any more information on the requests about who scheduled the grievance meeting. It is wholly irrelevant to plaintiff's gender discrimination claims. It is no more relevant than who the EAMC security guards were that all of the grievance attendees would have walked past to enter the building that day. If you really believe that it's relevant to the claims, then instead of continuing to insult EAMC and its counsel, please articulate the reasons why. This request, like so many others in this case, is simply not proportional to the needs of the case. And combined with your follow-up emails detailing the alleged deficiencies, they are abusive and expensive to the discovery process, which is designed to facilitate the exchange of information actually relevant to the underlying claims and defenses—not a fishing expedition into details that have nothing to do with Plaintiff's claims. So, please stop the nonsense. We are fully aware that this back and forth may be considered by the Court, and we are very comfortable with that. Warren

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On Feb 21, 2025, at 7:23 AM, Richard Newton <richardrussellnewton@gmail.com> wrote:

[Quoted text hidden]
<EAMC's Objections and Responses to Swann's Fourth Discovery Requests.pdf>

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